

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

**In re: Valsartan Products Liability
Litigation**

MDL No. 2875

This document relates to:

Hon. Robert B. Kugler,
District Court Judge

*Belinda J. Wood, Wife and Next of Kin to
Richard M. Wood, Deceased v. Aurobindo
Pharma, Ltd., et al.*; 1:20-cv-01003-RBK-JS

Hon. Joel Schneider,
Magistrate Judge

**PLAINTIFF'S MOTION FOR LEAVE
TO FILE AN AMENDED SHORT FORM COMPLAINT**

Plaintiff Belinda J. Wood, by and through counsel, states as follows:

Plaintiff seeks leave to amend the Short Form Complaint ("SFC") to correct the persons identified in questions I.1 and I.2 of the SFC. The original complaint inadvertently swapped the persons listed in those fields, though correctly named the party and the deceased in the caption. And Plaintiff updated I.2(b) to clarify that Plaintiff is the personal representative of the deceased in addition to his spouse. Corresponding changes were made to I.5(a) and the caption.

Pursuant to Local Rule 15.1(a), Plaintiff attempted to confirm whether Defendants would consent, not oppose, or oppose this Motion. However, Plaintiff was unable, despite making a good faith effort, to get a response from all Defendants. Exhibit A to this Motion is a clean copy of the proposed First Amended SFC. Exhibit B is redlined copy indicating the changes to the SFC. And Exhibit C is a Proposed Order.

Under Civil Rule 15.02, leave to amend should be "freely given when justice so requires." By granting leave, no party should suffer any prejudice as the case is still in the early stages of litigation. Thus, Plaintiff respectfully requests that the Court grant the Motion.

Dated: August 19, 2020

Respectfully submitted,

/s/ David Hobbs

David Hobbs
FLEMING NOLEN & JEZ, LLP
2800 Post Oak Blvd., Suite 4000
Houston, Texas 77056
(713) 621-7944
(713) 621-9638 (Fax)
david_hobbs@fleming-law.com
Counsel for Plaintiff

CERTIFICATE OF SERVICE

I certify that on August 19, 2020, I electronically filed the foregoing document with the Clerk of Court via the CM/ECF system, which will send notification of such filing to all parties in this action.

/s/ David Hobbs
David Hobbs